

11/2/2016 11:43 AM
2016-L-010795
CALENDAR: J
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CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
LAW DIVISION
CLERK DOROTHY BROWN
ID 20028

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - LAW DIVISION

DAVID TANG,)
)
Plaintiffs,)
) No.
vs.)
)
SOUTHEAST DIRECTIONAL DRILLING, LLC,)
a PLH GROUP COMPANY and ZACHARY DAHL,)
)
Defendants.)

COMPLAINT AT LAW

COUNT I - NEGLIGENCE

(SOUTHEAST DIRECTIONAL DRILLING, LLC, a PLH GROUP COMPANY)

Plaintiff, DAVID TANG, by and through his attorneys, PASSEN LAW GROUP, for his Complaint at Law against the Defendants, SOUTHEAST DIRECTIONAL DRILLING, LLC, a PLH GROUP COMPANY, and ZACHARY DAHL, states as follows:

1. At all times relevant, defendant, SOUTHEAST DIRECTIONAL DRILLING, LLC, a PLH GROUP COMPANY ("SOUTHEAST") was a limited liability company doing business in the County of Cook, State of Illinois.
2. At all times relevant, defendant, SOUTHEAST owned a 2007 Chevy Pick-up bearing Illinois license plate CJ19653 ("Pick-up").
3. At all times relevant, ZACHARY DAHL ("DAHL"), was employed by SOUTHEAST.
4. On March 17, 2016, SOUTHEAST, by and through its employee, DAHL, operated the Pick-up in a southbound direction on Elmhurst Road before attempting to turn left onto a private



road or driveway at or near 1100 Elmhurst Road, in the City of Elk Grove, County of Cook, State of Illinois.

5. At the time and place aforesaid, DAHL, was acting within the course and scope of his employment with SOUTHEAST.

6. On March 17, 2016, Plaintiff, DAVID TANG, was operating a motor vehicle in a northbound direction at or near 1100 Elmhurst Road, in the City of Elk Grove, County of Cook, State of Illinois.

7. On March 17, 2016, the Pick-up operated by DAHL, attempted to make a left hand turn off of Elmhurst Road into a private road or driveway when it struck the motor vehicle operated by plaintiff, DAVID TANG northbound on Elmhurst Road.

8. On March 17, 2016, Defendant, SOUTHEAST, by and through the actions of its employee, DAHL, was negligent in one or more of the following ways:

- a. Failed to yield the right-of-way to plaintiff's vehicle approaching from the opposite direction before turning into a private road or driveway, in violation of 625 ILCS 5/11-902;
- b. Crossed the center lane and drove into oncoming traffic when it was unsafe to do so;
- c. Failed to decrease speed, give audible warning or take evasive action so as to avoid colliding with another vehicle; and
- d. Failed to keep and maintain a proper and sufficient lookout.

9. As a direct and proximate result of one or more of the aforesaid negligent acts or omissions of Defendant, SOUTHEAST DIRECTIONAL DRILLING, by and through its employee, DAHL, Plaintiff, DAVID TANG, suffered and will continue to suffer injuries of a personal, pecuniary and permanent nature.

WHEREFORE, Plaintiff, DAVID TANG, prays for the entry of judgment in his favor and against the Defendants, PLH GROUP, INC., by its subsidiary SOUTHEAST DIRECTIONAL DRILLING, LLC, PLH CONSTRUCTORS, INC., d/b/a SOUTHEAST DIRECTIONAL DRILLING, LLC, and ZACHARY DAHL, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000) DOLLARS plus costs.

COUNT II - NEGLIGENCE
(ZACHARY DAHL)

Plaintiff, DAVID TANG, by and through his attorneys, PASSEN LAW GROUP, for his Complaint at Law against the Defendant, ZACHARY DAHL, states as follows:

1-7. Plaintiff repeats, readopts and realleges Paragraphs 1 through 7 of Count I and Paragraphs 1 through 7 of Count II as if specifically alleged herein.

8. On March 17, 2016, Defendant, DAHL, was negligent in one or more of the following ways:

- a. Failed to yield the right-of-way to plaintiff's vehicle approaching from the opposite direction before turning into a private road or driveway, in violation of 625 ILCS 5/11-902;
- b. Crossed the center lane and drove into oncoming traffic when it was unsafe to do so;
- c. Failed to decrease speed, give audible warning or take evasive action so as to avoid colliding with another vehicle; and
- d. Failed to keep and maintain a proper and sufficient lookout.

9. As a direct and proximate result of one or more of the aforesaid gross negligent acts or omissions of Defendant, DAHL, Plaintiff, DAVID TANG, suffered and will continue to suffer injuries of a personal, pecuniary and permanent nature.

WHEREFORE, Plaintiff, DAVID TANG, prays for the entry of judgment in his favor and against the Defendant, ZACHARY DAHL, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000) DOLLARS plus costs.

Respectfully submitted,

PASSEN LAW GROUP

By: 
Attorney for Plaintiffs

PASSEN LAW GROUP

Stephen M. Passen (spassen@passenlaw.com)
Matthew A. Passen (mpassen@passenlaw.com)
One East Wacker Drive, Suite 1750
Chicago, Illinois 60601



**Service of Process
Transmittal**

11/08/2016

CT Log Number 530154460

TO: Carolyn Lam
PLH Group, Inc.
400 Las Colinas Blvd E Ste 800
Irving, TX 75039-5567

RE: Process Served in Illinois

FOR: Southeast Directional Drilling, LLC (Domestic State: MN)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: David Tang, Pltff. vs. SOUTHEAST DIRECTIONAL DRILLING, LLC, et al., Dfts.

DOCUMENT(S) SERVED: Summonses, Complaint

COURT/AGENCY: Cook County Circuit Court - County Department - Law Division, IL
Case # 2016L010795

NATURE OF ACTION: Personal Injury - Vehicle Collision - 3/17/2016

ON WHOM PROCESS WAS SERVED: C T Corporation System, Chicago, IL

DATE AND HOUR OF SERVICE: By Process Server on 11/08/2016 at 10:30

JURISDICTION SERVED : Illinois

APPEARANCE OR ANSWER DUE: Within 30 days after receipt, not counting the day of receipt

ATTORNEY(S) / SENDER(S): Stephen M. Passen
PASSIEN LAW GROUP
One East Wacker Drive, Suite 1 750
Chicago, il 60601

ACTION ITEMS: CT has retained the current log, Retain Date: 11/09/2016, Expected Purge Date: 11/14/2016
Image SOP
Email Notification, LeAnn Wray lwrap@powerlinesinc.com
Email Notification, Carolyn Lam cnlam@plhgroupinc.com

SIGNED: C T Corporation System
ADDRESS: 208 South LaSalle Street
Suite 814
Chicago, IL 60604
TELEPHONE: 312-345-4336



Page 1 of 1 / MZ

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

Summons - Alias Summons

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

DAVID TANG

SOUTHEAST DIRECTIONAL DRILLING

No. 2016-L-010795

Defendant Address:

SOUTHEAST DIRECTIONAL DRILLING

R/A CT CORPORATION SYSTEM

208 S LASALLE STREET

CHICAGO, IL 60604

☒ SUMMONS ☐ ALIAS - SUMMONS

To each defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

☒ Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602

☐ District 2 - Skokie

5600 Old Orchard Rd.
Skokie, IL 60077

☐ District 3 - Rolling Meadows

2121 Euclid 1500
Rolling Meadows, IL 60008

☐ District 4 - Maywood

Maybrook Ave.
Maywood, IL 60153

☐ District 5 - Bridgeview

10220 S. 76th Ave.
Bridgeview, IL 60455

☐ District 6 - Markham

16501 S. Kedzie Pkwy.
Markham, IL 60428

☐ Richard J. Daley Center

50 W. Washington, LL-01
Chicago, IL 60602

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

☐ Atty. No.: 20028

Name: PASSEN STEPHEN M

Atty. for: DAVID TANG

Address: 1 E WACKER DR#1750

City/State/Zip Code: CHICAGO, IL 60601

Telephone: (312) 527-4500

Primary Email Address: ksanchez@passenlaw.com

Secondary Email Address(es):

ksanchez@passenlaw.com

Witness:

Wednesday, 02 November 2016

DOROTHY BROWN, Clerk of Court



Date of Service:

(To be inserted by officer on copy left with Defendant or other person)

**Service by Facsimile Transmission will be accepted at:

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS



DOC TYPE: LAW
CASE NUMBER: 16L010795
DEFENDANT
SOUTHEAST DIRECTIONAL DRILLING
208 S LASALLE
CHICAGO, IL 60604

DIE DATE
11/25/2016

SERVICE INF
RM 801 R/A
CORPORATI

ATTACHED

Summons - Alias Summons

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

DAVID TANG

v.

SOUTHEAST DIRECTIONAL DRILLING

No. 2016-L-010795

Defendant Address:

SOUTHEAST DIRECTIONAL DRILLING

R/A CT CORPORATION SYSTEM

208 S LASALLE STREET

CHICAGO, IL 60604

☒ SUMMONS ☐ ALIAS - SUMMONS

To each defendant:

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- ☒ Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602
- ☐ District 2 - Skokie ☐ District 3 - Rolling Meadows ☐ District 4 - Maywood
- 5600 Old Orchard Rd. 2121 Euclid 1500 Maybrook Ave.
- Skokie, IL 60077 Rolling Meadows, IL 60008 Maywood, IL 60153
- ☐ District 5 - Bridgeview ☐ District 6 - Markham ☐ Richard J. Daley Center
- 10220 S. 76th Ave. 16501 S. Kedzie Pkwy. 50 W. Washington, LL-01
- Bridgeview, IL 60455 Markham, IL 60428 Chicago, IL 60602

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

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☐ Atty. No.: 20028

Name: PASSEN STEPHEN M

Atty. for: DAVID TANG

Address: 1 E WACKER DR#1750

City/State/Zip Code: CHICAGO, IL 60601

Telephone: (312) 527-4500

Primary Email Address: ksanchez@passenlaw.com

Secondary Email Address(es):

ksanchez@passenlaw.com

Witness:

DOROTHY BROWN
Wednesday, 02/24/2016 02:00:01

DOROTHY BROWN, Clerk of Court

Date of Service:

(To be inserted by officer on copy left with Defendant or other person)

**Service by Facsimile Transmission will be accepted at:

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS



DIE DATE
11/25/2016

DOC TYPE: LAW
CASE NUMBER: 16L010796
DEFENDANT
SOUTHEAST DIRECTIONAL DRILLING
208 S LASALLE
CHICAGO, IL 60604

SERVICE INF
RM 801 R/A
CORPORATI

ATTACHED

CERTIFICATE OF SERVICE

The undersigned, being first duly sworn, certifies that she served the above documents by mailing the same to the party listed above at their correct mailing address, postage prepaid via the U.S. mail chute located at 330 North Wabash, Chicago, IL 60611 on or before 5:00 PM on December 6, 2016.



Nicole Bonek, Legal Assistant